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ELECTRONICALLY FILED
DOC #: 6/10/15
DATE FILED: 6/10/15

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

-against-

MICHAEL J. OPPENHEIM,

Defendant,

-and-

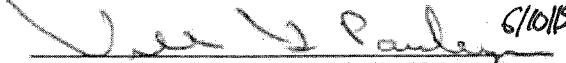
ALEXANDRA OPPENHEIM,

Relief Defendant.

x : 15 Civ. 2957 (WHP)

: ECF Case

: SO ORDERED:


WILLIAM H. PAULEY III
U.S.D.J.

STIPULATION AND [PROPOSED] ORDER

WHEREAS, Defendant Michael J. Oppenheim and Relief Defendant Alexandra Oppenheim wish to stay all proceedings in the above-captioned civil action pending resolution of the parallel criminal proceeding against Defendant Michael J. Oppenheim, entitled United States v. Oppenheim, No. 15 MAG 1255 (S.D.N.Y.) (the "Parallel Criminal Proceeding"); and

WHEREAS, Plaintiff Securities and Exchange Commission (the "Commission") does not object to the entry of a stay of these proceedings as specified herein;

IT IS THEREFORE STIPULATED AND AGREED by and between the undersigned counsel for Defendant, Relief Defendant and the Commission as follows:

1. All proceedings in the above-captioned action are hereby stayed pending resolution of the Parallel Criminal Proceeding, except as provided herein.

2. The Commission shall be permitted to conduct third-party discovery to determine the nature and extent of the Defendant's and the Relief Defendant's assets and financial condition.

3. This stay shall not alter the substantive and other procedural rights of the parties, including the Commission's right to continue to investigate matters related to the conduct alleged in the Complaint, and such rights are not waived and are expressly reserved.

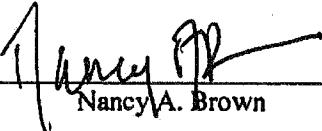
4. This stay shall continue until a judgment is entered in the Parallel Criminal Proceeding. Defendant and Relief Defendant shall have sixty (60) days after such judgment is entered in the Parallel Criminal Proceeding to move, answer or otherwise respond to the Complaint in this action.

Dated: New York, New York
May __, 2015

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SECURITIES AND EXCHANGE COMMISSION

By:


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Attorneys for Relief Defendant Alexandra
Oppenheim

SO ORDERED:

UNITED STATES DISTRICT JUDGE